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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

Barkley & Associates, Inc.,
Plaintiff,
v.
Quizlet, Inc.,
Defendants.

No. :24-cv-05964 WLH(Ex)

Declaration of Brian Tamsut in Support of
Barkley & Associates, Inc.’s Request to the
Clerk for Issuance of Subpoena Pursuant to
17 U.S.C. § 512(h)

I, Brian Tamsut, the undersigned, declare that:

1. I am an attorney licensed in the state of California and currently represent Barkley & Associates Inc. (“Barkley”). I submit this declaration on behalf of Barkley.

2. Barkley & Associates Inc. creates and distributes test preparation materials for nurses.

3. To protect customers, the public, and its business, Barkley monitors the internet for websites that display Barkley trademarks and copyrights without a license in an attempt to sell counterfeit and often dangerous products within the United States to US residents. Barkley has registered many of its trademarks with the United States Patent and Trademark Office and many of its photographs, marketing materials, and web content with the United States Copyright Office. These registrations are used to

close websites that sell counterfeit Barkley product and use Barkley's copyright protected test materials and books to do so.

4. Below is a sampling of Barkley registered copyrights and trademarks:

Copyright Reg. No.	Title
TX0008060976	Practice Considerations for Adult-Gerontology Acute Care Nurse Practitioners
TX0008184723	Barkley's Curriculum Review for Pediatric Nurse Practitioners
TX0008187376	Barkley's Curriculum Review for Adult-Gerontology Primary Care Nurse Practitioners
TX0008189386	Barkley's Curriculum Review for Family Nurse Practitioners
TX0008198957	Certification Review/Clinical Update Continuing Education Course

Trademark Reg. No.	Title
6272223	
6270781	BARKLEY & ASSOCIATES

5. The original copyrighted materials can be found at <https://www.npcourses.com/>.

6. Quizlet, Inc. has hosted the following usernames that sell bootlegged versions of Barkley's copyright protected test prep books and CDs:

mallorymcgee97	CruellaDevill3	Hn-ndirangu
erin_congleton8	ambp	frankoriana
lauren_cellini3	trish_gill_allmon	bancymuthoni885
rogersclay	hopesumandea	Dennoh_K
randitjheld	m22r25cnmf	courtneycaputoo
samanthaapinoo	mthompson4867	gichuki75
krystal_michelle8	Mariette_Franklin	denniswambui150
dirty_sar	Devon_Miller20	francis_thuo

dnp_rrt_medic	Jennifer_Gonzales	lopachinski
rozaggs	Eliana6855	Mose003
lorenze462	josh_brown34	gradeboost77
ashley_mcpherson6	TMZ777	IAN068018
ashlong3	keeganwood	trinanjeri0
nandirmrz	skb488	Amos_Kiragu
bonniebunnni	Yasmin_Franco5	Daniel_Gichobi
Karen_Taylor274	samantha_luttrell	yob98mk
bsimm13	dalimar_rodriguez3	edson_209
Magarcia214	jamielynnelliott	jamesmuthomi64
Rosie_Cruz3	karimikelvin92	jwirrie
Roberto_Kuria	DBSk7	Moureen_Karimi
Ltellis8441	LJewelsAPN	karimiwilliam69
briana_mucklow	Carole_Wilkinson	Zawadi182
Annemarie_Tutor	s_silvis	waciramwangi246
hemodynamix	casey_baine1	Wilfred_Mburu4
ccancino19956	kit_kat_k8	Yamabolt
Kemps05	Rcheshire	Gianinne_Alvarez3
kaylad1331	srg3880	shanique_coke
ssanjorge	ashleynelson7	karceneaux2
makroe0959	erinwhitehorne	Taylor_Culley28
fanfan_han	brookerackley13	Abby_Kolbow8
kay_kitty_socorro	Lindsay_Cerchio2	Ellen_Martini4
alicia_swindler2	micaelawest1	anyarangel
Michelle_Powers53	StudyBuddyNPC	jdcallaghan12
Maggie_Mwai	chloekemp7	klmazza12
skostan	Tamirm97	Emily_Malfitano8

rlb275	betsybennt03	alexandra_ecker
Gordon217	emcmahan2	xgrmmtnhr54
Melissa_Moore723	Maya_C60	Rebecca_DeTeresa
lgarc144	sfscoggins	moureen_wanjohi
Allie_Carter19	coruma1	Kylian1398
palaharvard	eleanormayfield	Wanyeki_Dan
Melissa_Kucukarslan7	kathryn_oelfke	edu_findrantez7
mgmuller95	krista_scott8	joyce_wambugu18
bluesonem	eleanordoddy_	Averie_Fuller52
Crhiannonj82	lreames	JackiB96
PATRICK_MAINA1	brandy_teague7	Adn2017Tif
ramvmallari	gwAPO1925	Stefani_Cain
lacrosse8768	Grace_Solipaca	Phinta
roselinemonde20	ajorda52	djjbb96
Jane_Theuri	Ben_Erickson41	lorilynn1190
thediddy_kong	nelson_muriithi5	torishae1
gabie_jones12	amos_Blackfire	Miriamkim33
stacimiddleton	SIRANTOS	Kyalokyema
Allison_Kroll	Emily_Wambura	jdec44
allyrosenberg10	mvelez9982	Alex_Kamau45
hmartin014	tibby_25	Dani_Cummings3
pandinhaexpress	ryancoryan4326	jaclynsl4
molly_nelson44	amanda_weiss9	nrdilly
nurse_girl	kanutabz82	irene_ung9
johny_boi1	Jon_Valderrama	user9832
awesomeTrinityLo	denis_kinyua5	Lillohmwai
annacfay7	maggie_loibl	jasonmitcham8

John_Matha	faith_rivers_bolding	newton591
Marquita_Mckissick	Kagwirah_Ke	Mudryk_gotyou
katiegoodwinart	Putin_Mee	Daniel_Bundi8
Cara85340	cheruharriss	leanna7897
hellodocs	Brianna_Whitehead5	crchris2
annwambui3932	upgrade73	sb8379
Mwikuuu	quizlette53336876	nmdonaTI
Jay_Son16	allenjillian12	sofiterry
alvinburtoncda	userhelperi	davong18_lawstuff

7. Attached as Exhibit 1 to this declaration is a true and correct copy of a DMCA takedown filed on July 9, 2025, under 17 U.S. Code § 512. This takedown was sent to Quizlet, Inc., to notify Quizlet that it was hosting infringing material via the website Quizlet.com and is assisting in the sale of counterfeit goods within the United States. This Exhibit contains both an example federal trademark and copyright registration owned by Barkley.

8. The purpose for which this subpoena is sought is to obtain the identities of the individuals copying test prep materials who have exploited Barkley's exclusive rights in the copyrighted material being sold without Barkley's permission. This information will only be used for the purpose of protecting the rights granted to Barkley & Associates, under Title II of the Digital Millennium Copyright Act.

Dated: July 11, 2025

/s/ Brian Tamsut

Brian Tamsut

SoCal IP Law Group LLP

Attorneys for Plaintiff Barkley & Associates
Inc.